

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION  
CIVIL ACTION NO. 3:19-cv-127**

|                                     |   |
|-------------------------------------|---|
| JACK THOMPSON, Individually and for | ) |
| Others Similarly Situated,          | ) |
|                                     | ) |
| PLAINTIFFS,                         | ) |
|                                     | ) |
| V.                                  | ) |
|                                     | ) |
| APPLIED SERVICES AUGMENTATION       | ) |
| PARTNERS, INC.,                     | ) |
|                                     | ) |
| DEFENDANT.                          | ) |

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**DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO  
RESPOND TO PLAINTIFF’S COMPLAINT**

Defendant respectfully moves the Court for an extension of time to respond to Plaintiff’s Complaint. In support of its Motion, Defendant states as follows:

1. The current deadline for Defendant to respond to the Complaint is April 9, 2019.
2. Defendant’s counsel needs additional time to prepare the response to the Complaint. Defendant’s request is not made for the purpose of mere delay. Defendant does not seek this extension for any purpose contrary to the Federal Rules of Civil Procedure or the Local Rules of this Court.
3. Plaintiff’s counsel has advised the undersigned counsel that he consents to a twenty-one (21) day extension through and including Tuesday, April 30, 2019.
4. In accordance with Section 3(b)(vi) of the Initial Scheduling Order, the proposed Order attached hereto as Exhibit 1 will be contemporaneously submitted to Chambers electronically in Rich Text Format using the CyberClerk feature of CM/ECF.

WHEREFORE, Defendant respectfully requests that this Court extend the deadline for it to respond to Plaintiff's Complaint through and including April 30, 2019.

Dated this 8th day of April, 2019.

Respectfully submitted,

By: /s/ Kevin J. Dalton  
Kevin J. Dalton (NC Bar No. 24197)  
**FISHER PHILLIPS LLP**  
227 West Trade Street, Suite 2020  
Charlotte, North Carolina 28202  
Telephone: (704) 334-4565  
Facsimile: (704) 334-9774  
[kdalton@fisherphillips.com](mailto:kdalton@fisherphillips.com)  
*ATTORNEYS FOR DEFENDANT*

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| PARTNERS, INC.,                     | ) |
|                                     | ) |
| DEFENDANT.                          | ) |

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 8, 2019, I electronically filed the foregoing **DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF’S COMPLAINT**, including Exhibit 1 thereto, with the Clerk of Court using the CM/ECF system, which will automatically send notice of such filing to Plaintiff’s counsel, Christopher Strianese at [chris@strilaw.com](mailto:chris@strilaw.com) and Tamara Huckert at [tamara@strilaw.com](mailto:tamara@strilaw.com).

Dated this 8th day of April, 2019.

Respectfully submitted,

By: /s/ Kevin J. Dalton  
Kevin J. Dalton  
**FISHER PHILLIPS LLP**